

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

UNITED STATES OF AMERICA, *et al.*,

Defendants

and

JANE DOE #1, JANE DOE #2, AND JANE
DOE #3,

Defendant-Intervenors

Case No. 1:14-cv-254

SUPPLEMENT TO JANE DOES' RESPONSE IN SUPPORT OF DEFENDANTS'
MOTION TO STAY

Defendant-Intervenors submit the attached Declaration of Cristina R. to supplement their Response supporting Defendants' stay motion (ECF No. 356). The Declaration of Cristina R., like the already-filed Declaration of Javier H. G. (ECF No. 356-1), provides evidence demonstrating the existence of the injury that this Court's May 19 order is already causing to thousands of DACA recipients and their family members nationwide, thereby further demonstrating why a stay pending the entire duration of the appeal should be issued. Defendant-Intervenors respectfully request that this Court consider the attached declaration of Cristina R. in ruling on Defendants' motion to stay (ECF No. 354). Defendant-Intervenors further request that this Court allow the declaration of Cristina R. to be filed under that pseudonym for the reasons set forth in their Motion to Use Pseudonymous Declaration (ECF No. 357). Both declarants,

Javier H. G. and Cristina R., should be allowed to submit declarations under pseudonyms for the reasons set forth in the motion. (*See* ECF No. 357).

Dated: June 6, 2016

Respectfully submitted,

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Attorneys for **JANE DOE #1, JANE DOE #2, and JANE DOE #3**

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of June 2016, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales

Nina Perales (Tex. Bar No. 24005046)
***Attorney-in-Charge for Jane Doe #1, Jane
Doe #2, and Jane Doe #3***